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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 DANIEL LEE RHEES,  
14 Defendant.  
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Case No. 2:23-cr-00017-APG-NJK  
**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Keisha K.  
20 Matthews, Assistant Federal Public Defender, counsel for Daniel Lee Rhees, that the  
21 Preliminary Hearing currently scheduled on March 27, 2023, be vacated and continued to a date  
22 and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. The continuance would allow Mr. Rhees to be put back on his medication  
25 regime prior to the hearing.  
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2. Parties have reached a non-trial resolution and need additional time to resolve this matter.

2. Defendant is in custody and does not object to a continuance.

3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

4. The additional time requested by this stipulation is excludable in computing the time within which the defendant must be indicted, and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

This is the first request for continuance filed herein.

DATED this 21st day of March, 2023.

RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

*/s/ Keisha K. Matthews*  
By \_\_\_\_\_

*/s/ Bianca R. Pucci*  
By \_\_\_\_\_

KEISHA K. MATTHEWS  
Assistant Federal Public Defender

BIANCA R. PUCCI  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

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**ORDER**

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
12 March 27, 2023, at the hour of 3:30 p.m., be vacated and continued to April 26, 2023 at 3:00 p.m.

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14 DATED: March 22, 2023.

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17 UNITED STATES MAGISTRATE JUDGE  
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